

St. Regis Mohawk Tribe, Environment Division
Site Specific Work Plan Proposal
Reynolds Study Site: Administrative Order Index No. II CERCLA-90230
May 17, 2006

Introduction

The Reynolds Metals Company (RMC) located in the Town of Massena, NY entered into a consent order with the New York State Department of Environmental Conservation (NYSDEC) in 1987 for contamination investigation. Subsequent to the consent order additional orders were developed by NYSDEC and the United States Environmental Protection Agency (USEPA) to better characterize hazardous substance contamination at the facility and in the St. Lawrence River in order to develop appropriate clean up remedies. The most recent change was the 1998 Decision Document Amendment that modifies remedies based on cost concerns and changes in clean up goals.

The St. Regis Mohawk Reservation is a Mohawk community located about 1 mile from the RMC facility and the Study Area. Risk Assessment studies have determined that contaminants from the Study Area pose unacceptable risks to several aquatic species in the river. Risk Assessment has also indicated greatest carcinogenic risk to be associated with ingestion of fish by humans and to be unacceptably high. Contamination from the Study Area has been shown to affect Mohawk fish and wildlife resources. Fish and wildlife are important to Mohawks not only for subsistence but also to traditional cultural practices.

The St. Regis Mohawk Tribe (Tribe) is the U.S. federally recognized governmental body of the Akwesasne Mohawks and administers health, welfare, and educational programs to its members. The Tribe is seeking additional support under the CERCLA Site Specific Support Agency Assistance program from the United States Environmental Protection Agency (USEPA), Region 2 that will allow it to participate meaningfully in the remedial action activities at the Study Area.

The Tribe submits this proposed work plan and attached budget to USEPA, Region 2 in consideration of funding for the Tribes participation in Site Specific activities at the Study Area. The work plan presents activities it will become involved with to ensure Mohawk concerns are addressed during the remedial project.

This site-specific support agency assistance amendment is necessary to continue Tribal participation and oversight of remedial action activities at the former Reynolds Metal dredging site.

Extensive dredging occurred in the St Lawrence River adjacent to Reynolds Metals during the summer of 2001. Subsequent sampling of the residual sediments showed PCB and PAH contamination above clean up goals of 1 ppm PCBs and 10 ppm PAHs. A temporary cap was constructed in 2001 to contain contaminated sediments in place until all final remedial activity had been completed. Additional sampling for PAHs was done in the fall of 2002, spring 2003, and summer 2004. The 2004 samples ~~analyzed~~analyzed the 61 dredge cells to depth that were determined in 2002 and 2003 to have elevated PAH levels above the cleanup goal. Final results to the 2004 sampling that 9 of the 61 cells do have elevated PAH levels at depth. Also, more bathymetry work was conducted in 2004 to assess the interim cap thickness to date. A proposed work plan will need to be developed to address the dredge cells with elevated PAH levels and completion of the cap design. Sampling report review from 2004, 2005, and review and oversight of remedial actions will occur in 2006-2007.

A technical consultant will be funded to assist with reviews of remedial action documents. Split sample analysis will be necessary for verification and ambient air sampling may be conducted to ensure exposure does not occur to nearby residents. Appropriate QA/QC activities will proceed as needed.

The Tribe will also need to maintain oversight of construction activities, such as site inspections, monitoring, review of monitoring reports, sampling and reporting to the community the progress of the clean up process. The construction phase requires as-builts be provided to document the Remedial Action. The Remedial Action culminates in a final inspection consisting of a walk-through and approval of the results of testing. A determination is made of the Remedial Action (except for the O&M) by USEPA for conformance to the Remedial Design report. Once the construction is complete a long term monitoring plan will be implemented with Tribal split sampling.

The Tribe requests funding to support its activities related to the review of RA documents, attend and participate in meetings and discussions with RMC and USEPA, oversight of remedial activities and manage administrative responsibilities relating to RA activities. The Tribe requests funding to support the salary of a Tribal staff person who will be responsible for representing the Tribe at meetings, reviewing and commenting on RA documents and to hire a technical consultant. The staff person and consultant will also be responsible for making site visits and inspections during RA activities and participate in the long term monitoring program. All of these tasks will be to ensure that the Tribes interests are met and communicated to RMC, USEPA and NYSDEC.

Approach

The Tribe proposes to participate in the RMC RA process by:

- Reviewing and commenting on RA documents:
- Conducting field visits/inspections
 - Construction activities
 - Sampling activities
 - Completion inspections
- Generating reports concerning the site
 - Progress reports to Environmental Division Director and Tribal Council
 - Reports concerning significant events or issues to USEPA, NYSDEC, RMC, and Tribal Council
 - Periodic public information to Mohawk Community
- Attending meetings with RMC and other Agencies
 - Field meetings at the site
 - Agency meetings with USEPA Region 2, NYSDEC Region 6
 - Tribal Council meetings
 - Public meetings
- Analysis of biota, sediment, water and air for verification and checks on remedial activities
- Participate in development and implementation of the long term monitoring program.

RMC Site Specific January 1, 2006 - December 31, 2007

<i>Description</i>	<i>Remedial Action</i>
Tribal Technical Oversight	\$15,643
Fringe	\$5,112
Indirect	\$3,637
Subtotal Personnel	\$24,392
Contractual - Technical	16,000
Contractual - Analytical	\$6,000
Travel	\$3,200
Supplies	\$4,430
Other	\$3,266
Grand Total	\$57,288

Supplies needed to support activities relating to the RMC Site Specific activities for Remedial Action.

Other

Travel

Local Mileage	\$ 581
Total	\$3,200